

# EXHIBIT S

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ALPHA PHI ALPHA FRATERNITY INC., )  
A NONPROFIT ORGANIZATION ON BEHALF )  
OF MEMBERS RESIDING IN GEORGIA; )  
SIXTH DISTRICT OF THE AFRICAN )  
METHODIST EPISCOPAL CHURCH, A )  
GEORGIA NONPROFIT ORGANIZATION; )  
ERIC T. WOODS; KATIE BAILEY GLENN; )  
PHIL BROWN; JANICE STEWART, ) CIVIL ACTION NO.  
PLAINTIFFS, ) 1:21-CV-05337-SCJ  
v. )  
BRAD RAFFENSPERGER, IN HIS )  
OFFICIAL CAPACITY AS SECRETARY )  
OF STATE OF GEORGIA, )  
DEFENDANT. )  
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VIDEO RECORDED DEPOSITION OF LISA HANDLEY  
(TAKEN by DEFENDANT)  
ATTENDING VIA ZOOM IN WASHINGTON, D.C.  
FEBRUARY 16, 2023

ALSO PRESENT: Alison Bos  
VIDEOGRAPHER: James Downie  
REPORTED BY: Meredith R. Schramek  
Registered Professional Reporter  
Notary Public  
(Via Zoom in Mecklenburg County,  
North Carolina)

1 Q And what's the other one?

2 A It's usually referred to as Kings EI or it's  
3 also been referred to as EI Iterative.

4 Q Okay. And is it your opinion that using that  
5 statistical analysis, you cannot determine whether  
6 party polarization better explains voting behavior than  
7 race polarization? That they can't be disentangled?

8 A That analysis tells me black and white voters  
9 are voting differently. It does not explain why  
10 they're voting differently.

11 Q Is it your opinion that in looking at the  
12 data that you provided that the combination of  
13 different races that you analyzed forecloses the  
14 ability for one to determine whether party better  
15 explains voter behavior than race?

16 A You'd have to repeat that. I'm sorry. I  
17 don't understand that question.

18 MR. JACOUTOT: No problem. Can the court  
19 reporter repeat it so I make sure we get it back the  
20 way I said it?

21 (Record read as requested.)

22 THE WITNESS: I would say that looking at  
23 democratic primaries takes race out of the equation and  
24 therefore provides some evidence that, at least in  
25 those contests, that party can't be explaining the

1 different voting patterns.

2 BY MR. JACOUTOT:

3 Q Okay. And so isn't another way of putting it  
4 that -- what you just said, that looking at democratic  
5 primaries actually controls for the party in  
6 determining -- I'll leave it at that.

7 A In a very narrow sense, yes.

8 Q What's narrow about it?

9 A You're looking at how people who chose to  
10 vote in the democratic primary are selecting candidates  
11 and therefore, they've already selected the party.  
12 They've all decided that they were Democrats. It  
13 doesn't explain why they've chosen to participate in  
14 the democratic primary versus the republican primary.

15 Q Okay. Does it matter -- strike that.

16 But I guess my -- to my question, though,  
17 that you said in a narrow sense I'm right when I phrase  
18 it this way, is it correct to say, though, that looking  
19 only at a party's primary elections controls for party  
20 in that analysis?

21 MS. LAKIN: Objection.

22 THE WITNESS: In the sense that everyone  
23 has -- everyone who's participating is of the same  
24 party, you are controlling for party.

25